

1 Martha G. Bronitsky, SBN 127583
Chapter 13 Standing Trustee
2 Leo G. Spanos, SBN 261837, Staff Attorney
Nima Ghazvini, SBN 254758, Staff Attorney
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6 UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
7 OAKLAND DIVISION

8
9 In re

10 Matthew Nazir
11 Kanwal Matthew

12
13 debtor(s)

Chapter 13 Case No. 17-40503-WJL13

11 **JOINT PREHEARING STATEMENT FOR**
12 **TRUSTEE'S OBJECTION TO CONFIRMATION**

14 **HEARING DATE:** May 11, 2017
15 **HEARING TIME:** 1:30 pm
16 **LOCATION:** Courtroom 220

17
18 Nima Ghazvini, Staff Attorney for Martha G Bronitsky, Chapter 13 Trustee met and conferred with Patrick
19 Forte on May 01, 2017. Remaining issues:

- 20 1. Plan does not fund
21 2. Plan is not feasible: Debtors' budget based in part on projected income
22 3. Statement of Financial Affairs (SOFA) lacks operation dates for Debtor's self employment income
23 4. Debtor Kanwal Matthew has not provided the Trustee with Pay Advices or a Certification Pursuant to
24 General Order 32
25 Debtors will amend their Plan to raise payments and fund it within 60 months. Debtors will file a
26 declaration regarding their income providing information regarding status of projected income. Debtors
27 will amend SOFA to provide information for dates of operation for Uber. Debtor Kanwal Matthew will file
28 a certification regarding lack of income and pay advices.

1 Date: May 01, 2017

/s/ Nima Ghazvini

Signature of Nima Ghazvini
Staff Attorney for Martha G. Bronistky

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1 In re

2 Matthew Nazir
3 Kanwal Matthew

debtor(s)

Chapter 13 Case No. 17-40503-WJL13

CERTIFICATE OF SERVICE

4 I HEREBY CERTIFY that I have served a copy of the within and foregoing document on the
5 debtor (s), counsel for debtor (s), and if applicable, the creditor, creditor representatives and the
6 registered agent for the creditor by depositing it in the United States mail with first class
postage attached thereto.

7 I declare under penalty of perjury under the laws of the State of California that the foregoing is
8 true and correct.

9 Matthew Nazir
10 Kanwal Matthew
11 2390 Tamalpais Avenue
Brentwood,CA 94513

Patrick L Forte Atty
1624 Franklin St #911
Oakland,CA 94612

(Counsel for Debtor)

12 (Debtor(s))

13 /s/ Martha Silva

14

Martha Silva

15 Date: 5/1/2017